

April 1, 2020

VIA U.S. MAIL and ECF

Hon. Anita B. Brody
United States District Court for the Eastern District of Pennsylvania
James A. Byrne United States Courthouse
601 Market Street, Room 7613
Philadelphia, PA 19106

Re: Fuentes v. Royal Dutch Shell PLC et al., Case No. 18-05174-AB

Hon. Anita B. Brody:

The parties have met and conferred and agree to the attached: (1) Agreement and [Proposed] Order Governing Production of Documents, Including Electronically Stored Information (Exh. A); and (2) [Proposed] Rule 502(d) Stipulated Order Governing the Disclosure of Privileged Information (Exh. B). In keeping with Your Honor's Policies and Procedures, the parties hereby jointly move the Court to enter the proposed orders.

Respectfully submitted,

/s/ Michael L. Schrag
Michael L. Schrag
(admitted pro hac vice)
mls@classlawgroup.com
Joshua J. Bloomfield
(admitted pro hac vice)
jjb@classlawgroup.com
George W. Sampson, Of Counsel
(admitted pro hac vice)
gws@classlawgroup.com
GIBBS LAW GROUP LLP
505 14th Street, Suite 1110
Oakland, California 94612
Telephone: (510) 350-9700
Facsimile: (510) 350-9701

/s/ Kevin Clancy Boylan
Kevin Clancy Boylan
cboylan@forthepeople.com
Pennsylvania Bar No. 314117

MORGAN & MORGAN
1600 John F. Kennedy Blvd.
Suite 900
Telephone: (215) 446-9795

/s/ John A. Yanchunis
John A. Yanchunis
jyanchunis@forthepeople.com
Florida Bar No. 324681
Marcio W. Valladares
mvalladares@forthepeople.com
Florida Bar No. 0986917
MORGAN & MORGAN COMPLEX
LITIGATION GROUP
201 North Franklin Street, Seventh Floor
Tampa, Florida 33602
Telephone: (813) 223-5505

*Attorneys for Plaintiff Victor Fuentes and the
Proposed Class*

/s/ Eliot F. Turner
Layne E. Kruse
Anne M. Rodgers
Eliot F. Turner
Norton Rose Fulbright US LLP
1301 McKinney, Suite 5100
Houston, Texas 77010-3095
Telephone: (713) 651-5151
Telecopier: (713) 651-5246

/s/ Andrea L. D'Ambra
Andrea L. D'Ambra
Norton Rose Fulbright US LLP
1301 Avenue of the Americas
New York, NY 10019-6022
Telephone: (212) 318-3000
Telecopier: (212) 408-5100

*Attorneys for Defendant Jiffy Lube International,
Inc.*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 1, 2020, a true and correct copy of the foregoing was electronically filed with the Clerk of Court using CM/ECF. Copies of the foregoing document will be served upon interested counsel via transmission of Notices of Electronic Filing generated by CM/ECF.

/s/ Michael L. Schrag